

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

CHRISTIE ANDREWS,

Plaintiff,

v.

**TRI STAR SPORTS AND
ENTERTAINMENT GROUP, INC.**

Defendant.

Civil No. 3:21-cv-00526
Judge Eli J. Richardson
Magistrate Judge Jefferey S. Frensley

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND THE DEADLINE TO FILE
RESPONSE TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Plaintiff files this motion to extend the deadline to file response to Defendant’s Motion for Summary Judgment (“MSJ Motion”).

Prior to filing this motion Plaintiff’s counsel conferred with Defense counsel and Defendant does not oppose this motion. As good cause for this motion Plaintiff provides that additional time is necessary due to numerous exhibits and depositions were designated by Defendant as confidential during discovery. Parties are working in good faith to limit the information Defendant will move to file under seal. Plaintiff’s counsel previously filed a motion to extend on November 17, 2022 [Doc. 41] and a corrected Motion to Extend deadline on November 21, 2022 [Doc. 42].¹

The current trial date is April 11, 2023.

Plaintiff’s current deadline to files response to December 1, 2022.

The requested extensions will not delay the case or impact other deadlines in place. The requested extension will still conform to the requirements of Local Rule 16.01(h)(1) that no

¹ Plaintiff’s counsel mistakenly included the dues dates using 21 days to respond as opposed to the 28 days provided in the Case Management Order in this case. [Doc. 12 PageID# 57].

dispositive motion deadline, including response and reply briefs, shall be later than 90 days in advance of the trial date.² Plaintiff request the deadline that following deadline for filing a response be extended to December 8, 2022.

For the foregoing reasons, Plaintiff respectfully requests this Court GRANT this motion.

Respectfully submitted,



Daniel Arciniegas
ARCINIEGAS LAW

² 90 days prior to the trial date of April 11, 2023, is January 11, 2023. Reply brief would be due December 22, 2022.

CERTIFICATE OF SERVICE

I hereby certify that on Monday December 1, 2022, I electronically served the foregoing ***Corrected Unopposed Motion to Extend the Deadline To File Response to Defendant's Motion for Summary Judgment*** via CM/ECF:

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Respectfully submitted,



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